



Common Origination and Disbursement

Frequently Asked Questions

Overview

This document contains frequently asked questions (FAQ) about Common Origination and Disbursement (COD). This document updates the COD FAQs posted to IFAP on August 14, 2003. These FAQs have been updated with 2003-2004 processing changes.

This document is an introduction to the COD process. Schools, third-party servicers and software providers can find detailed processing requirements and business rules in the 2003-2004 COD Technical Reference at: <http://www.sfadownload.ed.gov/docsStudentAidGateway.htm>. The 2003-2004 COD Technical Reference contains key 2003-2004 development information for both COD Full Participants and Phase-In Participants. Please note, beginning with the 2003-2004 Award Year there will no longer be separate Pell Grant and Direct Loan Technical References. The 2003-2004 COD Technical Reference contains both Pell Grant and Direct Loan processing information.

The FAQs are organized into the following sections:

- Common Origination & Disbursement Basics
- Tips for Full Participants
- Customer Service
- The COD Web Site
- Sending/Receiving Data in the COD Environment
- COD Student Identifiers & CPS Matching
- Frequent COD Data Edits
- Reconciliation Tools for Schools

Common Origination & Disbursement Basics

What is Common Origination and Disbursement (COD)?

Common Origination and Disbursement (COD) is a streamlined method for processing Pell Grant and Direct Loan financial aid data. The COD System went live in April 2002 for all Pell Grant and Direct Loan student level records. The COD System integrates the origination and disbursement processes for Pell Grants and Direct Loans that was previously performed by the Recipient Financial Management System (RFMS) and the Direct Loan Origination System (DLOS).



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Why did FSA implement COD?

FSA's current system architecture was built over a period of years using a variety of software products and platforms. Each system was built to support a single student aid program. The COD System is one piece of FSA's overall system modernization initiative to integrate student aid delivery systems. It is also key to improving services to schools.

COD represents a migration of program-centric systems to a student-centric system. COD processing integrates the Pell Grant and Direct Loan student level origination and disbursement functions into one system that will help FSA streamline data collection, eliminate data redundancy, and create a more student-centric process for schools and FSA employees.

The COD System also helps FSA and schools improve financial integrity by ensuring that Title IV funds are well managed. The COD process provides financial controls and tools to monitor schools' adherence to the regulatory 30-day reporting requirements. These tools are: web based views about student and batch level origination and disbursement data, information about funds drawn, funds available for draw, and several reports to help schools reconcile and correct data. Schools can also submit and correct data using the COD web site. The COD web site is designed to be a single entry point into the COD data repository of origination and disbursement data for use by the financial aid community, FSA staff, and COD customer service.

When was COD implemented?

The COD system began processing records in April 2002 for the 2002-2003 Award Year.

What kind of COD training is available to schools?

Schools have the opportunity to participate in a variety of training about COD including:

- Computer based training (CBT) available on FSA Download at: <http://www.ifap.ed.gov/eannouncements/1007CODUpdatedCBTDoc.html>.
- FSA's Spring Conference in March 2004. The latest COD information and training will be presented at this conference. Further information regarding the Spring Conference is available at: <http://edeworkshop.ncspearson.com/Spring.htm>.
- Schools may also access the FSA University website, <http://fsa4schools.ed.gov/SCHOOLSWebApp/index.jsp>, for additional information on upcoming events and training opportunities regarding COD.

How do I send records to COD?

For the 2003-2004 Award Year, schools have the option of sending their records to COD as either a Full Participant or Phase-In Participant.

The term Full Participant applies to schools that use the Common Record in XML format to submit Pell Grant and/or Direct Loan origination and disbursement data to the COD System by sending batches via the Student Aid Internet Gateway (SAIG), or the COD web site. For the



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2003-2004 Award Year, EDEExpress users for the Pell Grant and/or Direct Loan program will become COD Full Participants. All schools must be Full Participants by the 2005-2006 Award Year in order to process their Pell Grants and/or Direct Loan award and disbursement records (NOTE: This is a change from the information in previous FAQs).

The term Phase-In applies to schools that use the fixed-length record layout to submit records to COD. The fixed-length record layout is an updated version of the previous RFMS and DLOS record formats. Phase-In Participants submit Pell Grant and/or Direct Loan origination and disbursement data to the COD System by sending batches via the Student Aid Internet Gateway (SAIG)

Schools that use third-party servicers should consult with their servicers about specific software package capabilities and features prior to sending data to COD.

Did COD change the way schools receive funding for Pell Grant and Direct Loans?

Schools continue to receive funds the same way they did prior to COD implementation. For example: Pell Grant schools that participated in the Just-in-Time (JIT) program will continue in COD with the same JIT process. Advance pay schools continue to have the ability to draw down funds prior to submission of detailed student records. However, beginning with the 2002-2003 Award Year, the COD System implemented a funds management enhancement that allows FSA to better manage Title IV funds. Schools may continue to submit disbursement records 30 days (for Pell) and 7 days (for Direct Loan) in advance of the disbursement date, but COD will not make additional funds available until seven days prior to the disbursement date on the student record.

What are some benefits of the COD process?

The COD System offers schools several benefits and flexibility in establishing processing parameters that meet individual school needs. The following are some benefits of the COD process:

- *Student-centric view:* All schools have an expanded ability to access student financial aid history online via a secure Internet accessible web site. Schools can view Pell Grant and Direct Loan data for a single student on one COD web screen.
- *Less data to report:* Full Participants enjoy the benefit of the XML Common Record that requires only the student identifier information necessary to match to the proper record and the data required to process the business requirement. Full Participant schools no longer have to submit an entire fixed length record in order to update a data element.
- *Choice of “edit-only” or actual disbursement options:* All schools are able to send “edit-only” records. Disbursements sent as part of an “edit-only” record will not be posted to the student’s award (grant or loan). This will not influence the amount of money available to the school, unless the disbursement release indicator (the disbursement release indicator is a field on the Common Record that designates a record as an Actual



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Disbursement Record for Full Participants) on that record is later changed to “true”, or an actual disbursement record is received (for Phase-In schools).

Additional information is available in the 2003-2004 COD Technical Reference at: <http://www.sfadownload.ed.gov/CODTechRef0304.htm>. For the 2002-2003 Award Year Full Participants can refer to the 2002-2003 COD Technical Reference and Phase-In schools can refer to the 2002-2003 Pell Grant and/or Direct Loan Technical Reference at: <http://www.sfadownload.ed.gov/docsStudentAidGateway.htm>.

- *Option to have COD initiate drawdowns on the school's behalf:* Direct Loan Schools that are eligible to participate in the advance payment funding method may choose to have COD initiate drawdowns on their behalf, based upon accepted actual disbursement records.
- *Enhanced Cash Management Tools:* The COD System tracks and monitors schools' record reporting behavior and how quickly and accurately schools report records against their drawn cash. All financial aid offices and business offices can use the COD web site functionality to chart their own progress using the same information available to FSA, schools, third-party servicers, and COD customer service.
- *Easier to reconcile:* The COD System enables smooth and timely reconciliation by tracking and monitoring each school's drawdowns, reporting, and data corrections. This enables COD customer service and FSA to work with schools to avoid and resolve reconciliation problems.
- *COD customer service:* COD provides a single point of contact for customer service for Direct Loan and Pell Grant processing. Since spring 2003, COD customer service provides support for “RFMS” years (1999-2000 through 2001-2002) as well as “COD” years. COD customer service will continue to provide support for Direct Loan “COD” years. COD customer service provides each school with primary customer support staff who monitor their schools' reporting, including record rejects, drawing funds, and progress toward reconciling. Customer service staff work directly with schools and third-party servicers to resolve problems.
- *Streamlined process for requesting and reporting data:* Full Participants can use the flexibility of the Common Record to report a student's Pell Grant and Direct Loan award and disbursement data on a single XML record.
- *Access to information:* The COD web tools provide schools access to aggregate information across the Pell Grant and Direct Loan programs providing a comprehensive view of the school's transaction and funding information.
- *Faster turnaround times:* COD provides faster turnaround time for data submitted to FSA for processing. COD processes web transactions in real time and batch transactions many times per day.

How often is the COD System changed?

The COD System is changed through a series of system releases and is updated annually to implement new award years. However, additional changes and/or updates may be added to the



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COD System during an award year as needed. Information on updated and new key features available on the COD System is posted on the IFAP web site at: <http://www.ifap.ed.gov>.

Do Federal Family Education Loan (FFEL) schools have an option of whether they are Full Participants or Phase-In Participants?

No. Full Participant and Phase-In Participant status relates only to schools that participate in the Pell Grant or Direct Loan programs. Schools participating in the FFEL program continue to send their loan records directly to their guaranty agencies or servicers. FFEL schools that participate in the Pell Grant program must become COD Full Participants for their Pell Grant processing by the 2005-2006 Award Year (NOTE: This is a change from the information in previous FAQs).

The Common Record was developed in partnership with members of the National Council of Higher Education Loan Programs (NCHELP) and the Postsecondary Electronic Standards Council (PESC). This collaborative effort enables the Common Record to bring consistency and standardization to the transmission of student financial aid data. The Common Record provides a structure to allow for the addition of FFEL data. Thus, the inherent processing efficiencies of the COD process will also be available to FFEL schools as the FFEL trading partners adopt this format.

I've seen FSA presentations that discussed COD using a new computer technology. What is the new technology?

FSA has incorporated a variety of technologies in the COD process that speed transaction processing and provide other enhancements to schools. The highlights of the new technologies are:

- *XML*: Extensible Markup Language (XML) is the computer language COD uses for processing the Common Record and for web applications. XML uses data elements, like COBOL, BASIC, and other computer languages; but XML is more flexible and efficient. In COD, this flexibility enables schools to send only the minimum amount of data elements required for a business action, rather than an entire fixed-length record. The Department of Education has been working cooperatively to assist the FFEL loan community as they develop the "Common Record – FFEL and Alternative Loans". This record layout (XML Schema) is being developed by the Postsecondary Electronic Standards Council and is scheduled for release in July 2003 at: <http://www.nchelp.org/>.
- *Middleware/Electronic Application Interface (EAI BUS)*: The EAI BUS acts as a bridge between schools, interfacing systems, and the COD System. The EAI BUS is also referred to as "Middleware". It transmits information from a school's SAIG mailbox to COD and vice versa. Currently, the EAI BUS translates XML (Common Record) response documents generated by COD into fixed-length acknowledgment records for Phase-In Participants.



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What resources can schools refer to for information on the Common Record and fixed-length record layouts?

Full Participant schools can refer to the XML Schema. In basic terms, an XML Schema describes how the Common Record is laid out. An XML Schema specifies the rules surrounding the logical structure of an XML (Common Record) document. XML is a language that describes the allowed content of documents. It defines the elements present in the document and the order in which they appear, as well as any attributes that may be associated with an element.

The current XML Schema for the 2003-2004 Award Year is on the IFAP web site at: <http://ifap.ed.gov/cod/0210XMLCommonRecordSchema20c.html>. The 2004-2005 XML Schema is also available for schools at: <http://www.ifap.ed.gov/cod/COD0405CRXMLSchema20d.html>.

Full Participant and Phase-In schools can also refer to the 2003-2004 COD Technical Reference and 2004-2005 Draft Technical Reference, <http://www.sfadownload.ed.gov/CODTechRef0304.htm>, for information on the Common and fixed-length record layouts. For the 2002-2003 Award Year refer to the 2002-2003 COD Technical Reference at: <http://www.sfadownload.ed.gov/CODTechRef.htm>.

What are some XML online resources available to schools and servicers?

Some online resources schools and third-party servicers can review for information on XML include the following web addresses:

<http://www.w3.org>

<http://www.ebXML.org>

<http://www.oasis-open.org>

<http://www.standardscouncil.org>

Sun's XML Java Technologies: www.java.sun.com/features/1999/03/xml.html

The XML Industry Portal: www.xml.org/xml/resources_cover.shtml

XML Software: www.xmlsoftware.com

Web reference-Exploring XML: www.webreference.com/xml/

XML Information: www.xml.com/index.csp

The XML FAQ: www.ucc.ie/xml

Does the Department of Education provide an XML translator (file converter)?

No. The Department does not own an XML translator. FSA does not plan to obtain a translator in the future.

Can we send records to RFMS and DLOS?

No. As of July 31, 2003 the Recipient Financial Management System (RFMS) and the Direct Loan Origination System (DLOS) have shutdown and no longer process Pell and Direct Loan data.



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COD is now the single repository for Pell Grant data for award years 1999-2000, 2000-2001, and 2001-2002. Schools needing to submit data for processing for those award years must send files to COD and must use the appropriate message class for the corresponding award year. Records submitted to RFMS will not be processed. Refer to the IFAP posting at: <http://www.ifap.ed.gov/eannouncements/0819CODPellConversion.html>.

Additionally, the Direct Loan Origination Center (DLOS) no longer processes Direct Loan data. Records submitted to DLOS will not be processed. Refer to DLB-27 and DLB-33 for details at: <http://www.ifap.ed.gov/IFAPWebApp/currentDLBulletinsYearPag.jsp?p1=2003&p2=c>

As a reminder, COD replaced RFMS and DLOS for Award year 2002-2003 and forward. ALL data for these award years has been, and will continue to be processed through Common Origination and Disbursement (COD).

How do schools obtain prior Award Year Pell Grant and Direct Loan information once RFMS and DLOS are retired?

FSA has migrated all RFMS origination and disbursement data for award years 1999-2000 through 2001-2002 to COD. FSA will also migrate DLOS data into COD for years not closed in DLOS. As a result, schools will have to access only one system (COD) to request data and report changes.

Both Pell Grant disbursement, and Direct Loan origination and disbursement data continues to be available in the National Student Loan Data System (NSLDS). In addition, Direct Loan data will continue to be accessible via the Direct Loan Servicing System (DLSS). A COD User Name and Password is required to access both the COD and Direct Loan Servicing web sites (Single Sign-on). If you do not have a COD User Name and Password, you will not be able to access the DLSS website. Refer to Direct Loan Bulletin 03-40 for additional information, <http://www.ifap.ed.gov/dlbulletins/DLB0340.html>.

How do schools, third-party servicers, and software developers obtain information about COD processing issues?

Schools, third-party servicers, and software developers can obtain information about current production issues, news, and COD system functionality through various channels such as the COD web site, <http://www.cod.ed.gov>, and the IFAP web site, <http://www.ifap.ed.gov>. The following communication sources provide information to COD users:

- *COD web message:* COD posts messages on the COD web site providing users with information about COD processing, maintenance, holiday schedules, and new release functionality.
- *COD Processing Updates:* The COD Processing Updates provide information on COD processing issues and helpful hints. It is published on the COD web site daily at 12:00 noon eastern time. Detailed information regarding the COD Processing Updates is available on IFAP at: <http://www.ifap.ed.gov/eannouncements/0905CODUPDT.html>



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- *Direct Loan Bulletins*: Electronic Announcements and Direct Loan Bulletins are frequently posted on the IFAP web site. These letters and bulletins are published to inform the Direct Loan community of new functionality, program requirements, and processing updates.
- *Pmessage (Pell Grant Message)*: Electronic Announcements are used to inform the Pell Grant community of new functionality, program requirements, and processing updates. Pmessages are placed in schools' mailboxes via SAIG and are generally posted to IFAP and other electronic sources.

Tips for Full Participants

How does my school become a Full Participant?

Schools are encouraged to notify the COD School Relations Center as soon as possible of their decision to become a Full Participant by submitting a Full Participant Request letter to the COD School Relations Center. COD uses the information in the Full Participant Request letter to set processing flags and options for Full Participants that ensure Full Participant records are processed correctly. Please keep in mind the COD School Relations Center cannot make changes to a school's participation status without a valid signature from the school on school or corporate letterhead.

If you processed as a Full Participant for the 2003-2004 Award Year and want to continue processing the same way in 2004-2005, you do not need to take any action. However, if there is a change in your participation type for either program, you must notify the COD School Relations Center by submitting the Full Participant Request letter indicating those changes.

Detailed information regarding 2003-2004 Full Participant registration is available on IFAP at: <http://www.ifap.ed.gov/eannouncements/0226CODSignUpforFP0304.html>. For information regarding 2004-2005 Full Participant registration refer to IFAP: <http://www.ifap.ed.gov/eannouncements/1031CODFPSignUpfor0405.html>

Note: Schools using the 2003-2004 Pell Grant and/or Direct Loan modules of EDEExpress (Version 9.2) will automatically be COD Full Participants for the 2003-2004 Award Year and forward because EDEExpress has been modified to communicate with COD via the Common Record. Schools planning to use EDEExpress in 2004-2005 must complete a Full Participant Request letter ONLY if they did not use EDEExpress in 2003-2004 (and are not established as Full Participant schools in COD).

Schools may contact CPS/WAN customer service at 1-800-330-5947, or e-mail cpswan@ncs.com for assistance with EDEExpress.



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My school uses EDEExpress. What are my processing options for the 2003-2004 Award Year and forward?

EDEExpress users that utilize the 2003-2004 Pell Grant and/or Direct Loan modules (Version 9.2) will be Full Participants for the 2003-2004 Award Year and forward, and will submit their Pell Grant and Direct Loan data via a Common Record. To ensure the COD System accurately reflects Full Participant status, EDEExpress users must submit a Full Participant Request letter to the COD School Relations Center.

EDEExpress users will be able to take advantage of some of the enhanced processing options available to Full Participants such as the opportunity to send student level award data from both programs together in one submission. The COD Technical Reference for award year 2003-2004 (and subsequent award years), Volumes II & V, <http://www.sfadownload.ed.gov/CODTechRef0304.htm>, provides technical information regarding the Common Record process and guidance for using EDEExpress.

2003-2004 EDEExpress users must use Edconnect Version 5.2 or higher for transmitting information via the Common Record to COD. For more information on how to upgrade to Edconnect Version 5.2 refer to the posting on IFAP at: <http://ifap.ed.gov/eannouncements/0509UpgradeEDconnect5pt2.html>.

When must schools become Full Participant schools?

All schools must become Full Participant schools by the 2005-2006 Award Year (NOTE: This is a change from the information in previous FAQs). This means that all schools, software providers, and third-party servicers must be able to send and receive the XML (Common Record) format. COD will not support fixed-length records beginning with the 2005-2006 Award Year.

EDEExpress users who use the Pell Grant or Direct Loan modules will automatically be Full Participants for the 2003-2004 Award Year. However, EDEExpress schools must confirm their Full Participant status before transmitting records by submitting a Full Participant Request letter to the COD School Relations Center to ensure COD processes EDEExpress records correctly. If a school submits 2003-2004 records using EDEExpress software and COD does not reflect Full Participant status for that school, the records will reject.

What are the benefits of being a Full Participant?

The COD process benefits all schools, but Full Participants have additional flexibility not available to Phase-In Participants. However, your Institution's software may not be coded to allow you to take advantage of all the processing benefits COD provides.

- *Common Record submission:* The ability to submit a Common Record that can transport data for one or multiple schools, students, Program awards and Award Years, for the Pell Grant and Direct Loan Programs between the school and COD.



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- *COD online update:* The creation and editing of Pell Grant and Direct Loan award and disbursement data online via the COD web site.
- *Less data to report:* Although ALL Full Participant schools must provide the data elements required to process a business function, some Full Participant schools, dependent on their software, may not have to send a complete record to report a change in one data element. This is supported via batch and online processing.
- *Record processing options:* The ability to select processing options based upon the needs of the institution. Examples of these options include:
 - Setting a Pell Grant processing parameter to reject a record or correct data to continue processing (for example, Pell award amount).
 - Setting a parameter that tells FSA to print Direct Loan promissory notes on the school's behalf.

Will a school automatically be considered a Full Participant once a third-party servicer begins transmitting XML records on the school's behalf?

No. Schools must first individually sign up in order to be a Full Participant. COD must set processing flags and options for Full Participants in order to ensure their records are processed properly. School must confirm their Full Participant status by submitting a Full Participant Request letter to the COD School Relations Center. Failure to notify the COD School Relations Center before a third-party servicer begins submitting records on the school's behalf will cause their records to reject.

Once our school is a Full Participant, will we have limited functions in COD because we use a third-party servicer?

No. Schools will not be limited in any way using the COD System because a third-party servicer creates and submits their records. Once a school is set up as a Full Participant and has access to the COD web site, they will be able to perform the same functions as a third-party servicer.

Schools should carefully coordinate any entries/changes made on the COD web site with their third-party servicer to ensure that all parties involved are aware of what data is entered/changed in COD through the web site.

Can a school “back out” from Full Participant status after being registered as a Full Participant in COD?

Yes. A school has the option to “back out” and return to Phase-In status at anytime prior to processing. However, once a school transmits the COD XML Common Record to COD, the school cannot switch to the fixed-length record. Schools that need to “back out” should contact the COD School Relations Center as soon as possible.

Will COD process batches that contain improper fixed-length or XML formats?

Batches submitted to COD containing improper fixed-length or XML formats will not be processed or displayed on the COD web site. COD customer service takes a proactive approach



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in contacting and assisting schools in this situation. Customer service notifies the school that the batch was not processed and provides the school with the reason and action required to correct the batch.

What is the COD Routing ID?

As part of an initiative to establish a common school identifier across Title IV delivery systems, FSA began assigning new identifiers to COD Full Participant schools in 2002-2003. This new identifier, formerly known as the Common School Identifier or CSID, has been renamed the "Routing ID" and will be used in 2003-2004 and forward.

The Routing ID is an eight (8) character, numeric key that is randomly generated. The values in the key do not signify any information about your school except its identity. While a Routing ID has been established for all postsecondary schools and third party servicers submitting Pell Grant and/or Direct Loan records, *only COD Full Participant schools will actively use the Routing ID in Award Year 2003-2004.*

Full Participant schools must use the Routing ID when submitting 2003-2004 Common Records to COD. Note: The Routing ID is used in the four required Entity ID tags in the Common Record: Source Entity ID, Destination Entity ID, Reporting Entity ID, and Attended Entity ID. Additional information is available in the 2003-2004 COD Technical Reference at: <http://www.sfadownload.ed.gov/CODTechRef0304.htm>.

Note: 2003-2004 EDEExpress users are required to populate "Entity ID" fields on the Pell Grant and Direct Loan setup screens in EDEExpress. The Entity ID fields must be populated with a valid Routing ID. Populating the Entity ID fields correctly is crucial in ensuring Pell Grant and Direct Loan data exported to COD via EDEExpress can be identified and processed accurately. For more information on how to set up EDEExpress refer to the posting on IFAP at: <http://www.ifap.ed.gov/eannouncements/0507CODEDERoutingIDs.html>.

Customer Service

Who do I contact when I need assistance with COD?

Schools, third-party servicers, and software developers may contact the COD School Relations Center, by phone or e-mail, with questions regarding COD. Customer service representatives are available Monday through Friday, 8:00 A.M. to 8:00 P.M. eastern time, at: 1-800-4PGRANT for the Pell Grant Program or 1-800-848-0948 for the Direct Loan Program. Customer service may also be reached via e-mail at: CODSupport@acs-inc.com.

Does my school have a primary customer service representative (CSR)?



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Yes. The COD School Relations Center has assigned a primary customer service representative (CSR) to each school. COD customer service representatives are available to:

- Answer COD processing questions about the Pell Grant and Direct Loan programs in the 2002-2003 Award Year and beyond. In the near future, the COD School Relations Center will assume customer service support for prior year Direct Loan and Pell Grant issues.
- Assist in obtaining access to the COD web site as well as tips on navigation. The COD web site is a great tool for processing and viewing Pell Grant and Direct Loan data.
- Assist with any additional concerns or questions regarding COD.

How do schools reach their primary CSRs?

Contact the COD School Relations Center at 1-800-4PGRANT for the Pell Grant Program or 1-800-848-0948 for the Direct Loan Program. COD customer service is available Monday through Friday, 8 A.M. to 8 P.M. eastern time. When prompted, enter the school's Pell Grant-ID or Direct Loan School ID and the call will automatically be routed to the school's primary team. At this point schools can ask to speak with their primary CSR. If a member on the school's primary team is not available, the call will be routed to the appropriate backup. A voice mail message may also be left with COD customer service. Schools can also e-mail COD customer service at: CODSupport@acs-inc.com.

Do third-party servicers and software providers have a primary CSR?

COD has assigned primary CSRs to third-party servicers and software providers. To speak with a primary CSR call the COD School Relations Center at: 1-800-4PGRANT for Pell Grants or 1-800-848-0978 for Direct Loans. Third-party servicers and software providers can enter their school's Pell Grant-ID or Direct Loan School Code. If a school code is not entered when prompted, the call will then be routed to the next available representative.

What support does COD customer service provide for Full Participant and Phase-In Participants?

The COD School Relations Center has been fully staffed for over a year. Over that time, your COD customer service representatives have gained a great deal of knowledge and experience. CSRs are eager and ready to build relationships directly with schools. There are a number of tools that alert CSRs to risk areas so they can work with schools to prevent problems. Schools will continue to receive support through the following customer service functions:

- Support to schools and third-party servicers for testing school software applications with the COD system. Further information is available in the 2004-2005 COD Technical Reference, Volume VII, <https://www.fsadownload.ed.gov/CODTechRef0405.htm>.
- Support for XML (Common Record) and fixed-length record issues.
- Updated FAQs to share questions asked by schools posted on the COD web site.
- Updated version of the COD Computer Based Training available for download from IFAP at: <http://www.ifap.ed.gov/eannouncements/1007CODUpdatedCBTDoc.html>.



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- Implementation of the Buddy System to connect Phase-In schools with current Full Participant schools to exchange lessons learned and experiences.
- COD customer service staff support at the EAC Conferences.
- COD customer service outreach to schools. A special team of “Early Bird” CSRs monitor batch processing from the previous evening and alert schools to potential issues.
- Specialized Reconciliation Team to assist schools in reconciliation and closeout
- Updated communications about COD processing and features (DL Bulletin, Pmessage, etc.)
- Daily COD Processing Updates available on the COD web site, <http://www.cod.ed.gov>.

Are there other sources of assistance for schools?

Yes. Schools can refer to the Sources for Assistance Guide available on FSA Download at: <http://www.sfadownload.ed.gov/SASTechRef.htm>. This guide includes helpful contact information for all Student Financial Assistance programs including frequently called help lines, phone numbers, e-mail addresses, and web site addresses that are found in technical references and desk references published by the Department of Education.

The COD Web Site

What functionality does the COD web site provide?

The COD web site, www.cod.ed.gov, is a tool for processing and viewing Pell Grant and Direct Loan data as well as assisting schools with trouble-shooting and problem resolution. The web site provides the ability to access and/or view Pell Grant and Direct Loan reports, allows FSA, schools, third-party servicers, and COD customer service to view and use the same award data when questions arise. Note: The COD web site has replaced the RFMS web site and will replace the DLOS web site.

How do schools and third-party servicers get access to the COD web site?

To get access to the COD web site, a school must designate a School Security Administrator who is responsible for establishing other users at the institution and other associated procedures

Schools can refer to the IFAP web site, <http://www.ifap.ed.gov/cod/0318Schoolaccess.html>, for information on how to register a School Security Administrator, as well as how to grant access to additional school personnel, modify established accounts and perform other Security Administrator functions.

Third party servicers are also able to obtain access to the web site by referring to the IFAP posting at: <http://www.ifap.ed.gov/cod/03183rdPartyAccess.html>.



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How do I reset my user access if I am locked out of the COD System?

Security Administrators are able to unlock the users they have established at their institution. However, if the Security Administrator needs to be unlocked, he/she must contact the COD School Relations Center.

Is a login name and password required to view data on the COD web site?

COD web site users have the ability to perform school and batch searches, view news and current issues of the daily COD Processing Update without having to log on to the site. However, student or borrower specific information such as Name, SSN, DOB and individual award data is governed by the Privacy Act of 1974, as amended, and is not displayed or made available without a valid log-on User ID and password.

To view data without logging into the COD web site, go to www.cod.ed.gov. Click on the "School Search" or "Batch Search" buttons on the top bar.

- By clicking on School Search, users can enter a school ID or school name to view basic information about the school, such as school name and address, financial aid administrator contacts, and some summary financial information by program type (Pell Grant or Direct Loan).
- By clicking on Batch Search, users can enter a school ID and date range, or a specific batch ID to view the status of a particular batch along with the number of records that have been accepted, rejected, and corrected.

Does the COD web site have security measures in place?

COD has security measures in place to prevent security infringement of the COD web site. The COD System will automatically block any IP address from accessing the COD web site if subsequent activity within COD is determined to put the security of the COD environment or data within the COD System at risk. When an IP address is blocked, the COD School Relations Center will contact the COD user.

How do schools update their contact information on the COD web site?

Schools can update their Pell Grant and/or Direct Loan program's contact information on the COD web site from the School tab and then click on the "Financial Aid Contact" link. COD will display the current information for your institution. You are then able to update or add new financial aid contact information by clicking on the "Update" or "Add New" tab.

Please keep in mind that the Financial Aid Administrator or Director of Financial Aid e-mail address is used to deliver time sensitive materials, containing critical COD processing related information, to your school. Please ensure this contact information contains the most current e-mail address.



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Updates to school information such as school name, school address (including branches and locations), names of the Chief Executive Officer/President, Chief Financial Officer, and Director of Financial Aid must be reported by using the Electronic Application for Approval to Participate in Federal Student Financial Aid Programs (E-App) at: <http://www.eligcert.ed.gov>. Once the information is submitted through E-APP, the COD web site is normally updated with the new information in 24 hours. It may take longer if there is additional information required by Case Management and Oversight Division.

School can also refer to IFAP for information on updating school contact information in COD, <http://www.ifap.ed.gov/eannouncements/1126UpdateContacInfoinCODSys.html>.

How do schools view Pell Grant and Direct Loan data for concurrent award years on the COD web site?

COD has the capacity to process records for multiple award years simultaneously for all open award years. Schools and third-party servicers can access and view specific award year data by utilizing the award year dropdown box and selecting the desired award year. The award year dropdown box is available on the following screens: School General, School Summary Refunds of Cash, Cash Activity, Batch Search, and Person All Awards Information. Note: The award year dropdown box on the Person All Awards Information screen will only display award years for which the student has an award. The award year dropdown box for the Direct Loan program lists concurrent award years 2002-2003 and 2003-2004. The award year dropdown menu for the Pell Grant program lists concurrent award years 1999-2000 through 2003-2004.

How often is Pell Grant and/or Direct Loan disbursement information updated on the COD web site?

COD updates a student's disbursement information twice a day. However, the disbursement information is not applied to the COD Cash Activity screen and Yearly Totals until posting at approximately 10 P.M. (EST) each evening.

How are PLUS credit checks performed?

PLUS credit checks can be performed two ways.

- Schools can perform an abbreviated credit check by accessing the COD web site Credit Check Search screen at: <http://www.cod.ed.gov>. Enter the borrower's social security number and date of birth. Click "Request Credit Check".
- The COD System performs a credit check when a PLUS origination is received and a credit check has not been performed within 90 days.



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Sending/Receiving Data in the COD Environment

Can we test our system with COD prior to sending production records?

Yes. Although most software vendors test with COD prior to the release of their application (including EDEExpress), school testing is available to both Full Participant and Phase-In Participants as well as individual, third-party servicers and other software providers. This affords everyone the opportunity to test their software with the COD System prior to the transmitting and processing of production data.

Although school testing for the 2003-2004 Award Year is complete, COD has opened a testing window for the 2004-2005 Award Year. 2004-2005 School Testing registration began December 1, 2003. To participate in software testing for the 2004-2005 Award Year, schools, third-party servicers, and software providers must complete and submit a COD School Testing Signup document by May 1, 2004.

Detailed information regarding school testing is available on the COD web site at: www.cod.ed.gov. Click on the link titled "Click here if you are a school looking for updates on Common Origination and Disbursement." Click "2004-2005 School Testing Guide and Signup document."

What is the largest file size COD is able to receive and process?

The COD System is designed to receive and process files as large as 13 gigabytes. However, schools are encouraged to notify the COD School Relations Center prior to submitting files this large. COD will then assess the appropriate disk space needed to store and process the file.

How are batches acknowledged by COD?

After COD receives a Common Record, the system generates a receipt. A receipt is an XML document sent ONLY to Full Participant schools informing them that COD was able to read the Common Record they submitted. Phase in schools DO NOT receive a receipt.

COD also responds to each school's data submission files with a Response that indicates what data was accepted and what data was rejected. For all Common Record (Full participant) schools this response is returned in a COMRECOP file the school imports and uses to update its database. For Phase in schools this response is returned to the school in a fixed-length record format, as in past years, so their Legacy system can import the file and update its database.

When a Full Participant submits data via the COD web site, the option is available to receive a response via their SAIG mailbox. Full Participants will not receive a response for web-based transactions unless they have requested to receive web responses under the COD web site School



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Options Information screen. Phase-In schools will not receive an acknowledgement for web-based transactions.

Do schools and third-party servicers have any options about how they receive responses?

Phase-In schools will receive their responses only in the fixed-length format (still known as Acknowledgements). Full Participant schools have an option to receive a Full or Standard response for Common Records processed by the COD System. A Full response contains all the original tags (data elements) sent by the school, including any rejected data elements and reason codes. A Standard response contains only the rejected data elements and reason codes.

Depending on the application your school uses, you may be able to choose the response you want to receive by setting this option on the School Options Information screen on the COD web site. EDExpress users will always receive a Full Response. For other schools, if a response option has not been chosen, the option default is the Standard response. Full Participant schools can also override the standard response default on a record-by-record basis, by submitting the <FullResponseCode> tag on the Common Record.

Can schools determine the maximum number of characters that will be included in each line of an acknowledgement/response?

Only Full Participant schools can determine the maximum number of characters that will be included in each line of a response. This option is not available to Phase-In schools. Full Participants can view the "Record Length for XML" field under the COD web site School General Information screen for information on the maximum length of their record.

The "Record Length for XML" field stores the maximum number of characters that will be included in each line of a Common Record response. The default for the 'Record Length for XML' field, for schools will be set to 0. This means that the Common Record responses sent back will contain one tag (data element) per line.

Note: One tag per line makes the response easier to extract information from and read. However, this format returns trailing spaces for a fixed length of 200. To reduce the number of trailing spaces schools may contact COD customer service to change the "Record Length for XML" field to include more than one tag per line.

How will Phase-In schools update their system if responses are not returned for updates made on the COD web site?

Phase-In schools that use third-party servicers should consult with their third-party servicers prior to making updates on the COD web site. Phase-In schools will not receive acknowledgments for updates on the COD web site and may have to manually update their systems to match the information in COD.



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Where can schools and third-party servicers view the status of a batch submitted to COD?

Schools and third-party servicers may review the status of submitted data by accessing the COD web site and viewing the Batch Detail Information screen.

How do I correct data in COD?

All Full Participant and Phase-In schools can make individual student data corrections via batch processing. Schools should submit changed data (Full Participant schools) or change records (Phase-In schools) that include the new data element values.

As well, Full Participant schools and MOST Phase-In schools (check first with your software provider) are able to make individual student data corrections online through the COD web site. Again, Phase-In schools will not receive an acknowledgement (response) from web-based activities. Full Participants will not receive a response to the corrected transaction unless they have requested to receive responses for web-based activities on the COD web site School Options Information screen.

Additional information on correcting data for the 2003-2004 Award Year is available in the 2003-2004 COD Technical Reference at: <http://www.sfadownload.ed.gov/CODTechRef0304.htm>. For the 2002-2003 Award Year Full Participants can refer to the 2002-2003 COD Technical Reference, <http://www.sfadownload.ed.gov/CODTechRef.htm>. Phase-In schools can refer to the 2002-2003 Pell Grant and/or Direct Loan Technical Reference at: <http://www.sfadownload.ed.gov/docsStudentAidGateway.htm>.

Can Common Records be submitted for one program (Example: Pell Grants) and fixed-length records for another (Example: Direct Loan)?

Yes. When schools and servicers submit their Full Participant Request letters for the 2003-2004 Award Year, they must specify which program will be submitted in the XML (Common Record) format or the fixed-length format. COD will use this information to set processing flags and options for Full Participants. Detailed information about the Full Participant Request letter is available at: <http://www.ifap.ed.gov/eannouncements/0226CODSignUpforFP0304.html>.

Can Full Participants submit 2002-2003 and 2003-2004 Pell Grant and/or Direct Loan data in one Common Record batch?

Only 2002-2003 Full Participants may submit 2002-2003 and 2003-2004 Award Year data in one Common Record batch. However, the 2.0 XML Schema *must* be used.

Can schools submit origination and disbursement records simultaneously for the same student?

Yes. Full Participants can submit both origination and disbursement data on the same Common Record for the same student. Phase-In schools continue to transmit separate origination and disbursement data in specific origination and disbursement batches. Phase-In schools may



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transmit origination and disbursement batches together if there is no origination/disbursement already on file.

Phase-In schools that intend to submit adjusted origination and disbursement batches together are encouraged to wait for the origination acknowledgment before submitting the disbursement batch in to COD for processing.

Can schools update an origination ID after a student record is established in the COD System?

No. One of the benefits of the COD System is a student-centric approach to record processing. Each Award Year, each student recipient, or PLUS borrower, has a single “person” record, even if the student receives both a Pell Grant and a Direct Loan. Once the award, or origination ID, is established in COD, it stays with the student for the entire award year. Further information is available at: <http://ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html>.

Under what conditions can schools request Pell Administrative Relief (Pell Post Deadline Processing)?

Schools that need to report a new origination, increase an award amount via an origination record, or report a positive disbursement amount after the published deadline of each year must request Pell Administrative Relief in order to do so. However, the situation must be due to unusual circumstances beyond the school’s control or a processing error on the part of COD. Further information regarding Pell Administrative Relief is available at: <http://www.ifap.ed.gov/eannouncements/0922pelldeadline0203.html>.

Schools may request Administrative Relief via e-mail to sfa.administrative.relief@ed.gov or via the COD web site’s Request Post Deadline Processing screen.

Where do schools send promissory note manifests for the 2003-2004 Award Year?

All promissory notes and manifests for all award years should continue to be mailed to the Direct Loan Origination Center, P.O. Box 5692, Montgomery, AL 36103-5692.

What is a linked/unlinked Master Promissory Note (MPN)?

A linked MPN is an MPN that is associated with an accepted award(s) in COD. An unlinked MPN is an MPN that is not associated with an award(s).

When does a Direct Loan Subsidized/Unsubsidized and PLUS MPN link to an award?

When COD receives an MPN and an accepted subsidized/unsubsidized award is already on file and not yet linked to an MPN, the MPN and the award will be linked. If there are no accepted awards already on file the MPN will not be linked. Given all student data elements on the MPN match the data elements on the award 100%.



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When a PLUS MPN is received and an accepted PLUS award with a positive credit check decision is already on file and not linked to an MPN, the PLUS MPN and the PLUS award will be linked. Given all student and borrower (parent) data elements on the MPN match the data elements on the award 100%.

What criteria is used for linking an MPN to a Direct Loan Subsidized/Unsubsidized and PLUS award?

COD links an MPN to an accepted Direct Loan Subsidized/Unsubsidized award using the following student data elements:

- Current SSN
- Current Date of Birth
- First two characters of the first name OR the first two characters of the last name (if the first name is blank or doesn't consist of two alpha characters).

In the case of a PLUS MPN the data elements listed above will be applied to both the borrower (parent) and student.

How is an MPN expiration date calculated?

The MPN expiration date is calculated differently based on the status of the promissory note.

- For a pending MPN (one that does not yet have an award linked to it), the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the promissory note is not linked within 1 year, it expires. The school will need to obtain a new note from the student if there is no activity within 12 months.
- For an MPN that has been linked but has no award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 1 year. If the award linked to the MPN does not have an actual/funded disbursement within 1 year it expires. The school will need to obtain a new note from the student if there is no actual/funded disbursement activity within the first 12 months after COD receives the MPN for processing.
- For an MPN that has been linked and has at least one award with an accepted actual disbursement, the expiration date is calculated as the date the MPN is received by COD for processing plus 10 years.
- The COD System accepts an actual disbursement (Full Participant Disbursement Release Indicator = true) for any award linked to an MPN. This occurs, even if the MPN has expired, only when the award is already linked to the MPN and the disbursement successfully passes all other disbursement edits for being accepted by the COD System.

If the accepted disbursement is the first actual disbursement under the MPN and the date of that disbursement is on or before the MPN expiration date, the MPN expiration date is recalculated using the date the MPN was received at COD for processing plus 10 years and the MPN is reactivated (Accepted Status).



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Will the COD System accept subsequent disbursements for an award that is linked to an expired MPN?

The COD system will accept a subsequent disbursement that is not the first actual disbursement under the MPN. In this case the MPN expiration date remains unchanged and the MPN status stays the same.

What happens if the first actual disbursement is received and the date of that disbursement is after the MPN expiration date?

If the first actual disbursement under the MPN has a date that is after the MPN expiration date, the MPN expiration date remains unchanged and the MPN status remains inactive. A new promissory note is then needed for that disbursement.

Schools can refer to the 2003-2004 COD Technical Reference, <https://www.fsdownload.ed.gov/CODTechRef0304.htm>, for information regarding the Direct Loan Subsidized/Unsubsidized and PLUS MPN) linking process and calculating the MPN expiration date.



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COD Student Identifiers & CPS Matching

What person information is used to establish a student on the COD database?

A student is established on the COD System database once required “person” information is successfully matched to identifying information on the CPS database. For a Pell Grant, the student’s Social Security Number, DOB and first two letters of their Last Name are compared to CPS data and for a Subsidized/Unsubsidized loans, it’s the student’s SSN and DOB. If the match is successful the student is established on the COD database with the COD Student Identifier. The COD Student Identifier consists of the current Social Security Number, current Last Name and DOB. NOTE: The COD Student Identifier differs from the student identifier used for reporting Pell Grants in years past (was Origination ID). For additional information refer to the following link: <http://www.ifap.ed.gov/eannouncements/0113CODPellOrigID0203.html>.

Which student identifiers does COD match against the Central Processing System (CPS)?

In addition to comparing student data to CPS to establish a student on the COD database (previous question), COD does a second match with CPS using the award transaction number when establishing awards on the COD database. COD uses the CPS Transaction Number submitted to pull data elements from CPS for processing the award.

When a record contains a new student with a new Pell Grant Award, COD matches the SSN, Date of Birth, first two characters of the Last Name, and the CPS Transaction Number with data from CPS. When a record contains a new student with a Subsidized or Unsubsidized Direct Loan award, COD matches the SSN, Date of Birth, and the CPS Transaction Number with data from CPS.

Refer to the 2003-2004 COD Technical Reference, <http://www.sfadownload.ed.gov/CODTechRef0304.htm>, for complete information on this topic.

How do schools and third-party servicers change student identifiers on the CPS and COD System?

In order to change Student Identifier information on the CPS, the school or student must submit a correction to the ISIR/SAR (this will result in a new transaction in CPS). After the correction has been submitted to the CPS, the school must send the changed data to the COD System reporting the old student identifier and the new student identifier (SSN, DOB, or Last Name). COD stores ONLY one Student Identifier for each student; COD does not store separate Student Identifiers for each award.



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Where can schools view information the CPS has for students?

Schools may view ISIR data the CPS has for students via FAA Access to CPS Online web site at: <http://www.fafsa.ed.gov//FAA/faa.htm>. If you do not have access to the site, the Destination Point Administrator (DPA) for your TG number can register you as a user. Your DPA should go to the SAIG Enrollment Site at <http://www.fsawebenroll.ed.gov> and select "FAA Administration" to enroll people as FAA Users. All FAA Users will receive a PIN, which is required for access to the FAA Access to CPS Online site.

Keep in mind that student identifiers such as Social Security Number, last name, and/or date of birth CANNOT be updated online. Updates to student identifiers can be made by creating an electronic ISIR correction at the school or by the student via a corrected paper SAR.. If you have any questions about the FAA Access to CPS Online Web site, please contact CPS/WAN Technical Support at 800-330-5947 or via e-mail at CPSWAN@NCS.COM.

Which data elements are pulled from CPS?

The COD System determines if certain data elements are transmitted in Full Participant/Phase-In records or already exist for the student and award year on the COD database. If neither is true, the COD System will 'pull' these data elements from information provided by the CPS.

For each Pell Grant award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student and citizenship status.

For each Direct Loan award received, the following data elements are pulled from the CPS information when absent on both the record and the COD database: Address, Loan default/Grant overpayment for student, citizenship status and Dependency status. Note: Citizenship status cannot be pulled from the CPS for PLUS loans and, therefore, is required on records for PLUS loans.

Frequent COD Data Edits

What resources can schools refer to for information on Pell Grant and Direct Loan edits?

Full Participant schools can refer to the 2003-2004 COD Technical Reference, Volume II, Section 4 at: <https://www.fsadownload.ed.gov/CODTechRef0304.htm>. Phase-In schools can refer to the 2003-2004 COD Technical Reference Volume, III & IV, Section 4. Schools can also access the COD web site, www.cod.ed.gov, Help link for information on Pell Grant and Direct Loan edits.



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Are the COD data elements and edits the same for all programs?

The COD System takes advantage of commonality across programs to maximize the use of common data elements, edits, and a single student record. Student and parent recipient data, such as name, social security number, date of birth, and other non-program specific data are stored once, so a student/recipient will have one identifier record in COD for all programs. Edits that relate to general school and student eligibility are also the same across programs. However, some program specific data, such as Pell Grant disbursement amounts, do have unique data elements and edits and are applied as warranted.

We received an invalid transaction number error. How do we resolve this error?

Schools will receive an “Invalid Transaction Number” error (Full Participant Edit 024/Phase-In Participant Edit 311) when the Transaction Number reported for a student is not on file on the CPS. To resolve this edit, COD and the school need to first make sure that the CPS Transaction the school is paying on is indeed a valid transaction on the CPS database. If so, COD will need to research the cause of it’s absence and obtain the missing data.

Why are we receiving edits for “No eligible SSN, DOB, and last name combination match on CPS for a student”?

Schools will receive Full Participant Edit 011/Direct Loan Phase-In Participant Edit DLO A9/Pell Grant Phase-In Participant Edit 332, 333, 334, “No eligible SSN, DOB, and Last Name Combination Match On CPS for Student” when the Student Identifier (SSN, DOB, and Last Name) reported on the record cannot be found on the CPS. To resolve this edit, schools will need to:

- Verify the social security number, date of birth or last name submitted with the CPS.
- Resubmit the record with the correct identifier(s) to COD, or update the CPS and resubmit the record with the CPS transaction number that matches the current identifier.

What are the procedures for correcting duplicate matches on the CPS?

Schools may receive Full Participant Edit 025/Pell Grant Phase In Participant Edit 338, “Duplicate Match on CPS”, after submitting an Origination Record to COD. An Edit 025/338 is an error where the Student Identifier (SSN, DOB, Last Name) and CPS Transaction Number combination reported in the record has two or more matches on the CPS.

To correct Full Participant Edit 025/Phase-In Participant Edit 338, schools can refer to the procedures posted on IFAP at:

<http://ifap.ed.gov/eannouncements/0320UpdatedCODEdit025Proc.html>.



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How should schools resolve an “Invalid Destination Mailbox ID” error?

Schools will receive Full Participant Edit 001/Phase-In Edits 233 and 04 when the Entity ID is invalid or not assigned to send Pell Grant or Direct Loan data from that SAIG Destination Mailbox. Schools can resolve this edit by resubmitting the batch using the appropriate SAIG Destination Mailbox ID. Contact CPS/WAN customer service at: 1-800-330-5947, with concerns regarding the appropriate SAIG Destination Mailbox ID.

Why are we receiving an error indicating that Phase-In schools cannot submit Common Record documents?

A Phase-In school submitting Common Record documents will encounter Edit 107, “Phase-In schools cannot submit Common Record documents for this program and award year”, when COD does not reflect Full Participant status for that school.

Schools that intend to submit Common Record documents must first register to become a Full Participant in COD to ensure their records are processed correctly. Refer to IFAP, <http://www.ifap.ed.gov/eannouncements/0226CODSignUpforFP0304.html>, for information on 2003-2004 Full Participant registration. Information regarding 2004-2005 Full Participant registration is available at: <http://www.ifap.ed.gov/eannouncements/1031CODFPSignUpfor0405.html>.

Phase-In schools that do not intend to become a Full Participant must submit records in the fixed length format using the appropriate Phase-In record layout as described in the 2003-2004 COD Technical reference, Volume III & IV, section 3, <https://www.fsdownload.ed.gov/CODTechRef0304.htm>.

Can schools still disburse funds to students if they encounter an “Invalid Disbursement Due to Pending Bankruptcy” error?

Yes. Schools will encounter Full Participant Edit 89/Phase-In Edit 60 when the disbursement date submitted on a record is after the receipt of a pending bankruptcy notification.

As a result, COD will not accept upward adjustments and/or further disbursements for loans with an activity date on or after the date of that notification. However, schools may still award loan amounts to borrowers that have a pending bankruptcy. In order to disburse funds to the student, schools will need to follow the steps below:

- Obtain a new promissory note signed after the bankruptcy effective date.
- Originate another award in order to disburse funds to the student. Prior to originating another award you may need to modify the existing loan and/or pending disbursements so that the loan limits will not prevent the new loan from being accepted in COD.
- Submit disbursement record to COD with a disbursement date after the pending bankruptcy notification effective date.



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Note: The updated award must be linked to the new promissory note and originated after the receipt of the pending bankruptcy in order for schools to disburse successfully.

Reconciliation Tools for Schools

Are reconciliation regulations and requirements the same under COD as they were under DLOS and RFMS?

The COD System has not imposed new reconciliation requirements on schools, nor has it changed. Schools, as always, are required by regulation to report disbursements and changes timely. COD customer service takes a proactive approach in assisting schools with reporting disbursements within the 30-day reporting requirement by performing outreach to schools. CSRs monitor reporting and drawdown activities and work with schools to prevent and resolve potential reconciliation issues. The COD process provides a number of reconciliation tools.

What reconciliation tools does the COD web site offer?

The COD web site provides a number of reconciliation tools, including several reports and COD web site financial screens. Financial aid offices and business offices can both view drawdown and reporting activity as well as the data the COD System uses to “age” and “substantiate” the funds drawn. The following screens provide schools with information to assist in the reconciliation process:

- *School Funding Information* screen provides users with information on a school’s total accepted disbursement amount, amounts that were not disbursed, and information schools may use to determine the amount of available funds.
- *School Summary Financial Information* screen allows users to view a summary of a school’s Pell Grant and Direct Loan financial information.
- *Cash Activity* screen provides users with information on all drawdowns for a particular school.
- *Yearly Totals* screen provides users with information regarding a school’s total awards, total amount disbursed, total number of duplicated recipients, and the total number of unduplicated recipients.

Are there reports available to help schools reconcile?

Yes. There are Direct Loan and Pell Grant reports available to assist schools with their reconciliation processes. The COD System pushes reports to schools’ SAIG mailboxes, allows schools to view reports, and fulfill requests for reports via the COD web site and/or batch process.

Full Participants and Phase-In schools can refer to the COD Technical Reference <http://www.sfadownload.ed.gov/CODTechRef0304.htm>, for the 2003-2004 report layouts.



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The list below describes the Direct Loan and Pell Grant reports schools may find useful in the reconciliation process.

Direct Loan Reports:

30-Day Warning Report: The 30-Day Warning report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. It is also available on the COD web site. This report lists unbooked Direct Loans for which the COD System has not received one or more of the three the required elements (accepted origination record, disbursement record, and P-Note) for "booking" a loan.

Pending Disbursement List: The Pending Disbursement List (formerly the Anticipated Disbursement Listing) is generated weekly and is pushed to schools' SAIG mailboxes on the following Monday. It is also available on the COD web site. Schools can use the Pending Disbursement List report to determine estimated disbursements and disbursement dates on file on the COD System.

Funded Disbursement List: The Funded Disbursement List (formerly the Actual Disbursement Roster) is generated and pushed to schools' SAIG mailboxes daily. This report is also available on the COD web site. The Funded Disbursement List report displays all disbursements that have been funded.

Duplicate Student Borrower Report: The Duplicate Student Borrower report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. This report is available on the COD web site. The Duplicate Student Borrower report lists the student borrowers for which the COD System has accepted multiple Direct Loan Subsidized and/or Unsubsidized Award records with the same or overlapping academic years. Schools can see other schools that have submitted a record for a borrower attending their school.

Inactive Loans Report: The Inactive Loan report is produced monthly and is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. This report is available on the COD web site. The Inactive Loans report lists all Direct Loan awards that have been inactivated (adjusted to \$0) by the school for the reporting period. Schools can use this report during the closeout process to verify that their systems' records for inactive or cancelled loans match COD's records.

School Account Statement (SAS): The SAS report is generated on the first Saturday of each month and is pushed to schools' SAIG mailboxes the following Monday. The SAS reports COD data on Direct Loan cash balances, cash details, booked loans, and booked or unbooked disbursement transactions. Schools are able to choose various format options for the SAS report by contacting the COD School Relations Center. Refer to Direct Loan Bulletin (DLB) 02-35, <http://www.ifap.ed.gov/dlbulletins/DLB02035.html>, and DLB 02-36,



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Frequently Asked Questions

<http://www.ifap.ed.gov/dlbulletins/dlb0236.html>, for more detailed information. Refer to electronic announcement <http://ifap.ed.gov/eannouncements/0703DLToolsv30final.html> for more information in using the SAS report in conjunction with DL Tools software.

Note: Schools are able to choose various format options for the 30-Day Warning report, Pending Disbursement List, Funded Disbursement List, Duplicate Student Borrower report, SAS report and Inactive Loans report by accessing the Report Selection Link under the COD web site School Summary Information screen. School user levels 3-5 have access to select format options via this link.

SSN/Name/DOB Change Report: The SSN/Name/DOB Change Report is only produced when a change is made to a student's SSN, Name and DOB. This report is pushed to schools' SAIG mailboxes and is available on the COD web site in the Direct Loan Reports section under the school services tab. This report shows SSN, Name and DOB changes that are initiated by any school, and SSN changes that are initiated by Direct Loan Servicing. Schools can also view changes made to a person by performing a person search on the COD web site. Click on the "Events" tab located on the left side of the screen. This will allow users to view any changes made to the person record.

Direct Loan Rebuild: The Direct Loan Rebuild is used to rebuild a school's lost or corrupted Direct Loan database or to recreate specific student records. Schools may request the Direct Loan Rebuild via the COD web site Batch Search screen. Refer to Direct Loan Bulletin 03-31, <http://www.ifap.ed.gov/dlbulletins/DLB0331.html>, for details on how to request the Direct Loan Rebuild.



Common Origination and Disbursement

Frequently Asked Questions

Pell Grant Reports:

Multiple Reporting Record (MRR): The MRR is produced and pushed to schools' SAIG mailboxes when COD receives disbursement records from multiple schools for the same student whose enrollment dates are within 30 days of each other.

The Multiple Reporting Record (MRR) provides information to schools about a student's Pell Grant origination and disbursement status at other schools/campuses and the amount of the scheduled Pell Grant award disbursed. The MRR is a tool that identifies two primary types of multiple reporting conditions: concurrent enrollment and potential overaward situations.

Schools may request the MRR via the data request batch process (PGRQ03IN/PGRQ04IN) or via the COD web site Batch Search screen. The MRR is also available by request for origination purposes.

Pell Year-to-Date (YTD): The Year-to-Date (YTD) Record shows the number of recipients at the school; the number of award and disbursement records that were accepted, corrected, and rejected; and, for certain edit codes, the number of times a school received that specific edit code on a response document. The YTD Record can be used to replace a corrupt database or to reconcile records with accepted data on COD.

Schools may request the YTD via the data request batch process (PGRQ03IN/PGRQ04IN) or via the COD web site Batch Search screen. Note: The Pell Year-To-Date (YTD) report has been revised to allow Full Participant schools (including schools using EDEExpress version 9.2) to use the file for recreating their database. Refer to the Electronic Announcement on IFAP at: <http://www.ifap.ed.gov/eannouncements/112522Ann.html>.

Pell Reconciliation: The Pell Reconciliation report is a one-record summary of the data that COD has for the student. This report can be used to reconcile the total disbursement amount per student with COD. This file is provided only in the fixed-length record format and is detailed in its record layout found in Volume 8 of the 2003-2004 COD Technical Reference available at: <http://www.sfadownload.ed.gov/docsStudentAidGateway.htm>.

Schools may request the Pell Reconciliation file via the data request batch process (PGRQ03IN/PGRQ04IN) or via the COD web site Batch Search screen.

Electronic Statement of Account (ESOA). The ESOA summarizes the status of a school's Current Funding Level (CFL) verses the net drawdown for that award year. This report is pushed to schools' SAIG mailboxes each time the school's CFL changes. Schools may also request an ESOA via the data request batch process (PGRQ03IN/PGRQ04IN) or via the COD web site Batch Search screen.



Common Origination and Disbursement

Frequently Asked Questions

What if I need information that is not available on the reports listed above?

The COD School Relations Center has the ability to create customized reports (Ad hoc reports) when the standard reports do not provide needed information. Schools should contact the COD School Relations Center for assistance.

What is Direct Loan (DL) Tools?

DL Tools is a stand-alone module of EDEExpress software designed to assist Direct Loan schools, re-build lost or corrupted loan and/or disbursement data in an EDEExpress database, functions as a Cash Management Tool to track cash transactions (drawdowns and returns of cash), compare the SAS and/or 732 reports to loans and actual disbursements recorded in EDEExpress (or an external file), and/or compare the reports to the DL Tools Cash Database.

DL Tools can be downloaded at: www.SFAdownload.ed.gov. Refer to electronic announcement <http://ifap.ed.gov/eannouncements/0703DLToolsv30final.html> for more information on using DL Tools software.

Where do schools send refunds of cash for Title IV funds?

Funds should be returned using the Electronic Refund function in GAPS at: <http://e-grants.ed.gov/egHome.asp?APP=>. The Electronic Refund function can be accessed from the GAPS 'Main Menu'. For additional information access refund procedures via “Frequently Asked Questions” for GAPS.

The Department will continue to accept refund checks. Pell Grant funds for all award years should be returned to:

Department of Education
P.O. Box 952023
St. Louis, MO 63195

Direct Loan funds should be returned to:

COD School Relations Center
P.O. Box 9001
Niagara Falls, NY 14302

Note: Refer to DLB 03-29, <http://www.ifap.ed.gov/dlbulletins/DLB0329.html>, for detailed information on refunding Direct Loan funds.



Frequently Asked Questions

What's new with the Potential Over Award (POP) process?

Beginning with 2002-2003 Award Year, a change has been implemented to improve the efficiency in which Potential Overaward Project (POP) situations are resolved. This change was implemented in response to numerous schools requesting a new process to resolve POPs that were "blocking" the eligible school and student from receiving funds under the old process. This new process prevents the "blocking" problem by allowing the overaward to exist for 30 days while schools work together to resolve the issue.

When a Pell Grant award has been disbursed by multiple schools, and causes the student to exceed 100% of his or her Scheduled Pell Grant award, COD will notify all schools involved via a Multiple Reporting Record (MRR). Schools must research the student's status, confirm eligibility and reduce disbursements that should not have been made.

If schools do not reconcile POP situations within 30 days, COD will generate a "Negative Disbursement" and reduce ALL disbursements to zero (\$0.00) at all involved schools. The eligible school may resubmit actual disbursement data to reinstate the student's award. If multiple schools resubmit disbursements, causing an overpaid status again, COD will send another MRR to all schools involved. To avoid this cyclic situation, schools should collaborate with the corresponding POP affected school(s) and correct the overpayment situation.

More information regarding the business rules pertaining to POP situations is available in the 2003-2004 COD Technical Reference at:

<http://www.sfadownload.ed.gov/CODTechRef0304.htm>.

What should a school do if all attempts to work with the corresponding POP school have failed?

COD understands that mediation between schools may be difficult at times. When mediation has failed and the same school(s) continues to submit disbursement records for the same student, schools may contact the COD School Relations Center. COD customer service representatives are available assist in mediating and escalating POP issues to the Department's FSA Operations area for resolution.